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## Testing Starts in the Qwest Regional 3<sup>rd</sup> Party OSS Test

Actual testing began yesterday in the Qwest Regional Oversight Committee's (ROC's) independent third-party test of Qwest's operational support systems. The testing will exercise the functionality and capabilities of the systems and processes provided by Qwest to its competitors in the local phone service market.

Commissioner Bob Rowe of the Montana Public Service Commission, who heads the multi-state effort, stated, "This is an important milestone in progress towards completion of the regional test. We've been working toward actual testing since we developed the idea two years ago. It represents the hard work and collaboration of all the parties involved in this truly unique effort. I look forward to hearing the results as testing progresses over the next several months. Thanks to all the parties for a great effort in getting us to this point!"

Operational support systems, termed OSS, are the systems a telephone company uses to provide service to its customers, whether these are its own retail customers or competing telephone companies. OSS functions which Qwest must provide at the same level to its competitors as it provides to itself are pre-ordering, ordering, provisioning, repair and maintenance, and billing.

The scope and approach of the ROC test of Qwest's OSS is governed by a test plan that was collaboratively developed by the participating state commissions, Qwest, competitive local providers and test consultants.

The three consultants hired by the ROC to conduct the test have been busy preparing for the test to begin. KPMG Consulting, as the overall test administrator for the ROC test, is responsible for ensuring that all test elements contained in the master test plan are executed. At the conclusion of testing, KPMG will produce the final report of the test results, with input from HPC. Hewlett Packard Consulting is acting as a newly established competitive local exchange carrier to serve as an unbiased vehicle for testing Qwest's systems, documentation and processes. HPC has established the interfaces between itself and Qwest that are required for interacting with and submitting orders to Qwest. Liberty Consulting is in the process of conducting an audit to ensure that all aspects of Qwest's wholesale performance measures and retail parity standards are sound and comply with the collaboratively developed ROC performance measurement definitions.

Section 271 of the federal Telecommunications Act of 1996 set out the procedure through which Bell Operating Companies such as Qwest could be allowed to provide long distance service within their own regions in exchange for opening their systems to local competition. Section 271 sets out a "14- point checklist," and requires that allowing the Bell Operating Company into in-region long distance be determined to be in the public interest. The Federal Communications Commission makes determinations, state-by-state, based on consultation with the federal Department of Justice and state public utility commissions. State commissions play a key role in developing a factual record and resolving the entire range of problems associated with opening local phone systems to competition.

The ROC OSS test collaborative was established by 13 of the 14 states served by Qwest. It is an open, web-based process, providing a forum for all interested parties to resolve issues. States involved in the project are: Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington and Wyoming.

A second, separate ROC collaborative project is also making good progress as it works to develop a plan to ensure the local phone service market in Qwest's region remains irreversibly open to competition once Qwest is allowed to begin providing in-region long distance service is also making good progress.

Working in parallel with the ROC OSS testing collaborative, the participants in the 11-state ROC post-entry performance plan collaborative effort have largely agreed on the performance measures that will be used in the plan. Discussions are continuing on proposals for the plan's statistical and penalty payment calculation methodologies.

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The group will next meet April 24-26 in Portland. Rowe said there is "cautious optimism" among the parties that agreement on many post-entry performance issues can be achieved through the collaborative process. Issues left unresolved will be addressed on a state-by-state basis.

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